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June 19, 2013

Via Electronic Filing

Marlene H. Dortch, Esq. Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

Re: SoftBank/Sprint License Transfer Applications

IB Docket No. 12-343

File No. ISP-PDR-20121115-00007 Notice of Ex Parte Presentation

Dear Ms. Dortch:

On June 19, 2013, Michael Pryor of Dow Lohnes PLLC, counsel to SOFTBANK CORP. ("SoftBank"), and the undersigned, counsel to Sprint Nextel Corporation ("Sprint"), met with Courtney Reinhard of Commission Pai's office regarding the above-referenced proceeding. During the meeting, we urged the Commission to grant the above-referenced applications promptly because they serve the public interest.

As discussed during the meeting, it is now Day 201 on the Commission's "shot clock" in this proceeding, 21 days beyond the Commission's 180 day goal for completing its review of license transfer applications. The pleading cycle closed almost four months ago.

The record shows that the transactions will result in substantial consumer benefits. The transactions have been cleared by the U.S. Department of Justice, the Committee on Foreign Investment in the United States, and Team Telecom. The transactions will cause no competitive or other public interest harms. The transactions also will not increase spectrum aggregation, given that SoftBank currently has no attributable interests in U.S. spectrum licenses or leases,

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and Clearwire's spectrum interests are already attributed to Sprint; there consequently is no need for the Commission to deal with spectrum screen issues in this proceeding.¹

Finally, although the applications are ripe for grant, various parties continue to make untimely and non-transaction specific arguments in this proceeding. The Commission should reject these arguments and enforce its rules and policies against untimely and non-transaction specific arguments in merger proceedings.² These policies promote a fair, timely merger review process that focuses on the *public* interest rather than the private agendas advanced by various parties seeking to turn the Commission's processes to their private advantage.

The Commission should expeditiously complete its review and grant the above-reference applications.

Respectfully submitted,

/s/ Regina M. Keeney Regina M. Keeney

cc: Courtney Reinhard
Mindel De La Torre
Ruth Milkman
Sean Lev
Louis Peraertz
David Goldman
Priscilla Delgado Argeris

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Joint Opposition to Petitions to Deny and Reply to Comments, IB Docket No. 12-343, at 24-27, 31 (Feb. 12, 2013) ("Joint Opposition"); Letter from Regina Keeney, Counsel to Sprint, and John Feore, Counsel to SoftBank, to Marlene Dortch, FCC Secretary, IB Docket No. 12-343, at 1-2 (May 1, 2013).

See Public Notice, DA 12-2090, IB Docket No. 12-343, at 4 (Dec. 27, 2012) (prohibiting parties from raising new issues after initial pleading round without good cause showing); 47 C.F.R. § 1.45(c). See also Joint Opposition at 39-40 (summarizing Commission precedent against consideration of non-transaction specific issues in merger review proceedings).